

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
PANAMA CITY DIVISION

RAMON ARNAS ACERROMO, JR.,
Plaintiff,

vs.

CASE NO. 5:04 CV 165-RH/WCS

L. McDONALD, PATE

MCKENZIE and KENT.

PLAINTIFF'S FIRST SET OF INTERROGATORIES

TO: At L. McDONALD, PATE, MCKENZIE, AND KENT
At: JOY A. STUBBS, The Capitol, PL-01, Tallahassee
Florida, 32399

Plaintiff, prose, and pursuant to Federal Rules of Civil Procedure, Rule 33,
serve the following First set of Interrogatories, to be answered separately and
fully in writing under oath and signed by Plaintiff within (30) days after service.
Where space provided is insufficient, please attach and refer to separate sheet
of paper sufficient to complete said answer, or use your own paper
listing the interrogatory and the answer to it.

OFFICE OF CLERK
U.S. DISTRICT CT
NORTHERN DIST. FLA.
TALLAHASSEE, FLA.

2006 DEC 11 PM 1:05

WJD
FILED

1. Please identify yourself fully, giving your full name and stating any and all felonies or misdemeanors for which you have ever been charged and/or convicted of.

2. Please : (a) describe in as much detail as you can, everything that was seen or noticed by yourself on November 28, 2002.

(b) State where each such witness was in relation to the alleged occurrence, at the time he or she witnessed the occurrence of claims of the plaintiff said date.

3. Please state where and when the alleged occurrence happened, giving the date, hour, and minute as nearly as possible.

4. Please state the reason the plaintiff was taken out of his cell.
5. Please state whether the defendants possessed the plaintiffs medical files at the time of the alleged occurrence.
6. Please state at the time as accurately as possible that the plaintiff was removed and returned to his cell.
7. Please to state the approximate time it takes to conduct a medical examination of the nature for which the defendants allege.
8. Please state how many officers are necessary to pull one inmate out for a medical examination.

9. Please state whether the alleged medical examination was initiated by the plaintiff.

10. Please describe, in detail, your activities on the date of the alleged occurrence.

11. Please describe how the alleged occurrence took place, presenting all events in detail in order the order in which they occurred, before, at the time of, and after the occurrence, which had any bearing on the cause and manner of the happening of the occurrence.

12. Please state in detail your exact behavior during the two-hour period just prior to and leading up to the time of the alleged occurrence.

13. In the 24-hour period preceding the alleged occurrence, please state all drugs you consumed, including alcohol and medicines, and the time and amount of each consumed by you.

14. Please describe, in detail, your activities 48 hours after the alleged occurrence.

17. Please give the substance of all statements, communications, or conversations by or between you and any defendant, ~~or the plaintiff~~, relative to the alleged occurrence.

18. Identify and describe any written, oral statements, or reports of the alleged occurrence made by you regarding the alleged occurrence.

19. State the name and business address of all persons who have any personal knowledge of any of the allegations contained in the complaint.

20. For each person identified in interrogatory #19, please describe set forth the substance of their knowledge of the allegations contained in the complaint.

21. Have you ever been convicted of a crime, which involved the that involved dishonesty or a false statement regardless of punishment? If so, state as to each conviction, the specific crime, the date and the place of conviction.
22. Have you ever been reprimanded for any reason by the F.D.O.C.? If so please describe any infraction for which you were reprimanded whether said reprimand was verbal or written.
23. Please state whether medical examinations are conducted on a routine basis on holidays.
24. Please state whether nurse kent at any time complained that the plaintiff was masturbating when she was at the plaintiff's cell.

Answering Party

ST STATE OF FLORIDA

COUNTY OF _____

The foregoing instrument was acknowledge before me this _____
day of _____, 2006, by _____, who is personally
known to me or who has produced _____, as identification
and who did (did not) take an oath.

(SEAL)

NOTARY PUBLIC